

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

<b>JANIE SAMUEL,</b>	:	
<b>AS ADMINISTRATOR OF</b>	:	<b>Case No. C-1-02-378</b>
<b>THE ESTATE OF</b>	:	
<b>CATHY LYNN TUBBS, et al.,</b>	:	<b>Judge Michael R. Barrett</b>
	:	
<b>Plaintiffs,</b>	:	
	:	
<b>-vs-</b>	:	
	:	
<b>STEVEN M. HOOG, et al.,</b>	:	<b><u>JOINT STATUS REPORT</u></b>
	:	
<b>Defendants.</b>	:	
	:	

Pursuant to the Court's January 31, 2007 Order, (Doc. 55), the parties submit the following joint status report.

Although substantial progress has been made in deposition discovery, the paper discovery has taken, and will require, some additional time. Plaintiff requested paper discovery of certain documents from the City of Cincinnati. Additional time was agreed for the City to provide such documents. The City has provided some of the requested documents. The parties have scheduled additional reviews of remaining documents. Following review of these documents, it is anticipated that additional depositions will need to be taken to complete discovery.

The parties are working together to complete discovery in a timely manner. At this time, the parties expect that they will need 60-120 days beyond the dates set forth in the Court's September 14, 2006 Order (Doc. 53) in order to complete discovery and prepare this case for trial. However, the parties request that they be permitted to report back to the Court within 60 days with a status report on the additional

time needed for discovery and with proposed scheduling dates after the remaining documents requested from the City have been reviewed, and that current deadlines be extended pending the parties' report.

Respectfully submitted,

s/ Peter J. Stackpole (by Ward Washington per authorization)

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Trial Attorney for Plaintiffs

#### **CERTIFICATE OF SERVICE**

I hereby certify that on March 2, 2007, I electronically filed the foregoing with the Clerk of Court using the CM/ECF which will send notification of such filing to Peter J. Stackpole, Esq., City of Cincinnati Solicitor's Office, 801 Plum Street, Room 214, Cincinnati, OH 45202; and Kimberly A. Rutowski, Esq., Hardin Lefton Lazarus & Marks LLC, 30 Garfield Place, Suite 915, Cincinnati, OH 45202.

s/ Ward B. Washington

Ward B. Washington